



THE CITY OF SAN DIEGO

December 21, 2017



VIA EMAIL TO: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

**Subject: Comment Letter – Proposed Recycled Water Policy Amendment Early Public Consultation**

Dear Ms. Townsend:

The City of San Diego (San Diego) appreciates the opportunity to provide comments on the State Water Resources Control Board's (State Water Board) proposed amendment to the Policy for Water Quality Control for Recycled Water (Recycled Water Policy) and offers the following comments regarding monitoring for Endocrine Receptor and Aromatic Hydrocarbon Receptor (ER and AhR).

San Diego's Public Utilities Department has been an active stakeholder with the Southern California Coastal Water Research Project (SCCWRP) in the development of ER and AhR bioassay methods. These highly sensitive methods have the ability to gauge biological responses in organisms that cannot be gauged by chemistry alone. Ultimately, these bioassay methods may be useful in monitoring of discharges. However, at this time we caution against establishing regulatory or permit requirements for bioassay monitoring of ER and AhR beyond information gathering. Should the State Board carry forward the bioassay monitoring of ER and AhR, there should be clear statements that such monitoring is for purposes of information gathering only, and there is no implication that such monitoring will become a mandate or that the monitoring criteria will necessarily become permit conditions.

San Diego hopes to continue its partnership and collaboration with the State Board and dedication to further the scientific basis of water quality regulations. Thank you for your time and consideration of these comments. If you have questions, please contact me at 858.292.6424 or [cpieroni@sandiego.gov](mailto:cpieroni@sandiego.gov).

Sincerely,

Cathleen C. Pieroni  
External Water Policy Program Manager

